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September 10, 2013

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RE: Great Northern Insurance Co., a/s/o D. Gideon Searle v. Cellar Advisors, LLC

Court No.: 12 CV 9343
Venue: Northern District of Illinois
Judge: Honorable James Zagel
Our File No.: 005.12014

Dear Counsel:

I am writing regarding discovery in the above-captioned matter. I will first address the proposed deposition schedule.

Counsel
September 10, 2013
Page 2 of 3

1. Depositions in the St. Louis area.

You proposed, and sent deposition notices, for the following individuals:

- a. Marc Lazar
- b. Lauren McIntosh
- c. Krissy Hof
- d. Joseph Mooney
- e. Christopher Klingenstein (Klingenstein)

The depositions are scheduled October 1 through October 3, 2013.

Mr. Klingenstein does not live or work in the St. Louis area. His deposition, if you decide it is necessary, will proceed in the Chicago area. We can schedule that deposition with the other Chicago depositions.

Mr. Mooney no longer works for Cellar Advisors. As you have agreed to do with Mr. Malcolm, I am working to produce him for his deposition. At this time, however, I am not certain of his availability at the time chosen.

More importantly, Mr. Lazar is not available for a deposition during the period of October 1 through October 3, 2013. I assume you want to make only one trip to St. Louis, so we will need to find alternative dates for the St. Louis depositions. Let me know if you prefer more than one trip to St. Louis and I will then work to schedule the requested depositions.

2. Depositions in the Chicago area.

You proposed depositions for the following individuals:

- a. Mr. Stewart (Jack Stuart, I assume)
- b. Mr. Olson
- c. Mr. Searle

The depositions are scheduled October 22 through October 23, 2013.

First, I will be in Maine on October 23 and 24, 2013 for depositions in another matter. May I propose the depositions proceed on October 21 and 22?

Second, as discussed above, if you feel it is warranted, may we also add Christopher Klingenstein to the Chicago-area depositions?

3. Depositions in the Indianapolis area.

You proposed depositions for "the four current and former employees" of Sataria proceed between November 19 and November 21, 2013. In a prior letter, it was proposed that five (5) current or former employees of Sataria be deposed. Please confirm which current or former Sataria employees you are planning to present between November 19 and November 21, 2013.

Counsel
September 10, 2013
Page 3 of 3

I am available on the proposed dates for the depositions of Sataria current and former employees. I will begin making arrangements for the depositions after it is confirmed who you are proposing to present.

4. Depositions in the Naples area.

You proposed depositions for "Allan Zubar, representative(s) of Florida Freezer and a representative of Fairway Wine Storage" proceed on December 3 and December 4, 2013. I am available on the proposed dates for the depositions of the independent adjuster and representatives of Florida Freezer and Fairway Wine Storage.

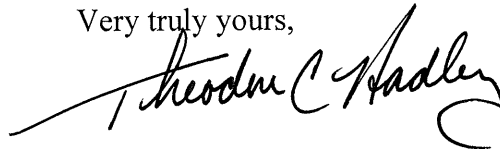
5. Telephone Depositions.

Finally, you proposed the telephonic depositions of Mary Mullen and Charese Pagliaro. No dates were proposed. I have no objection to the electronic deposition of the individuals identified.

My client and I are working on the propounded written discovery. We are close and I will have responses to you by the end of this week.

I look forward to hearing from you concerning the issues raised in this letter concerning the proposed deposition schedule.

Very truly yours,

A handwritten signature in black ink, appearing to read "Theodore C. Hadley", with a long horizontal flourish extending to the left.

Theodore C. Hadley